

GUIDELINES FOR REGULATING NON-MANUFACTURED WOOD PACKING IN USE FOR THE TRANSPORT OF COMMODITIES

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INTRODUCTION

SCOPE

This standard describes phytosanitary measures to reduce the risk of introduction and spread of quarantine pests associated with non-manufactured wood packing materials in use for the transport of commodities in international trade.

REFERENCES

[note to include references for data supporting prescriptive requirements and/or list in appendix]

DEFINITIONS AND ABBREVIATIONS

Additional declaration

Glossary term

A statement that is required by an importing country to be entered on a phytosanitary certificate and which provides specific additional information pertinent to the phytosanitary condition of a consignment

Bark

Proposed

The part of the outer layer of a woody plant not including the vascular cambium which has the potential to harbour pests

Bark-free wood

Proposed

Wood from which all evidence of bark has been removed, except that the vascular cambium, ingrown bark around knots, and bark pockets between rings of annual wood may remain

Chemical preservative impregnation

Proposed

Impregnation of wood with a chemical preservative through a process of heat and pressure in accordance with an officially recognised technical specification

Certificate

Glossary term

An official document which attests to the phytosanitary status of any consignment affected by phytosanitary regulations

Commodity

New or revised pending adoption

A type of plant, plant product, or other article being moved for trade or other purpose

Consignment <i>New or revised pending adoption</i>	A quantity of plants, plant products and/or other articles being moved from one country to another and covered, when required, by a single phytosanitary certificate (a consignment may be composed of one or more lots)
CPI <i>Proposed</i>	Acronym for chemical preservative impregnation.
Debarking <i>Glossary term</i>	Removal of bark from round wood (debarking does not necessarily make the wood bark-free)
Dunnage <i>Glossary term</i>	Wood packing used to brace or support a consignment but which is not part of the consignment
Emergency action <i>New or revised pending adoption</i>	A prompt phytosanitary action undertaken in an abnormal or unexpected phytosanitary situation.
Emergency measure <i>New or revised pending adoption</i>	A phytosanitary regulation or procedure established in an abnormal or unexpected phytosanitary situation. An emergency measure may or may not be a provisional measure.
Fumigation <i>Glossary term</i>	Treatment with a chemical agent that reaches the commodity wholly or primarily in a gaseous state
Find free <i>Glossary term</i>	To inspect a consignment, field or place of production and consider it to be free from a specific pest
Free from (of a consignment, field, or place of production) <i>Glossary term</i>	Without pests (or a specific pest) in numbers or quantities that can be detected by the application of phytosanitary procedures
Infestation (of a commodity) <i>Glossary term</i>	Presence in a commodity of a living pest of the plant or plant product concerned. Infestation includes infection
KD <i>Proposed</i>	Acronym for kiln drying

Kiln-drying

Proposed

A process in which wood is dried in a closed chamber using artificial heat and/or humidity control to achieve a required moisture content

Manufactured wood packing

Proposed

Wood packing comprised wholly of wood-based products such as plywood, particle board, oriented strand board, veneer, wood wool, etc., which have been created using glue, heat and pressure or a combination thereof

Non-manufactured wood packing

Proposed

Wood packing excluding any wood-based products such as plywood, particle board, oriented strand board, veneer, wood wool, etc., which have been created using glue, heat and pressure or a combination thereof

NPPO

Glossary term

Acronym for national plant protection organization

Phytosanitary action

New or revised pending adoption

Any official operation, such as inspections, tests, surveillance or treatments, undertaken to implement phytosanitary regulations or procedures in relation to consignments, regulated articles, places of production, areas or where otherwise justified

Phytosanitary certificate

Glossary term

Certificate patterned after the model certificates of the IPPC

Phytosanitary measure

Glossary term

Any legislation, regulation or official procedure having the purpose to prevent the introduction and/or spread of pests

Phytosanitary procedure

New or revised term

Any officially prescribed method for implementing phytosanitary regulations including the performance of inspections, tests, surveillance or treatments in connection with regulated pests

Phytosanitary regulation

New or revised pending adoption

Official rule to prevent the introduction and/or spread of quarantine pests, or to limit the economic impact of regulated non-quarantine pests, including establishment of procedures for phytosanitary certification

Plant products

Glossary term

Unmanufactured material of plant origin (including grain) and those unmanufactured products that by their nature or that of their processing , may create a risk for the introduction and spread of pests

Quarantine pest

Glossary term

A pest of potential economic importance to the area endangered thereby and not yet present there, or present but not widely distributed and being officially controlled

Raw wood

Proposed

Wood which has not undergone a treatment to permanently alter its character such as KD or CPI

Regulated article

Glossary term

Any plant, plant product, storage place, packaging, conveyance, container, soil and any other organism, object, or material capable of harbouring or spreading pests, deemed to require phytosanitary measures, particularly where international transportation is involved

Round wood

Glossary term

Wood not sawn longitudinally, carrying its natural rounded surface, with or without bark

Sawn wood

Glossary term

Wood sawn longitudinally, with or without its natural rounded surface with or without bark

Treatment

Glossary term

Officially authorized procedure for the killing, removal or rendering infertile of pests

Wood

New or revised pending adoption

A commodity class for wood, wood chips, wood packing and root wood, whether or not sawn, with or without bark

Wood packing

Proposed

Wood or wood products (excluding paper products) used in supporting, protecting or carrying cargo

OUTLINE OF REQUIREMENTS

[to be completed]

1. Purpose

Wood packing is frequently made of non-manufactured, low grade, inexpensive raw wood that has not had sufficient processing or treatment to remove or kill pests present in the raw wood and therefore becomes a pathway for the introduction and spread of pests. Of particular concern is the fact that non-manufactured wood packing can be present with any imported consignment, including many which would not normally be the target of phytosanitary inspection. NPPOs may establish requirements for non-manufactured wood packing to manage the pest risk associated with this pathway.

2. Exemptions

Certain wood packing materials by their nature, processing or handling are not considered a pathway for the introduction of quarantine pests and should be exempt from being regulated as non-manufactured wood packing.

2.1 Manufactured wood packing

Wood packing comprised wholly of wood-based products such as plywood, particle board, oriented strand board, veneer, and wood wool which have been created using glue, heat and pressure or a combination thereof should be considered sufficiently processed to have removed or killed any pests which may have been associated with the raw wood and should therefore not be regulated as non-manufactured wood packing.

2.2 Non-manufactured wood packing

Non-manufactured wood packing materials, such as veneer peeler cores, that by their nature, processing or handling are not a pathway for the introduction of quarantine pests, and where this phytosanitary status can be practically verified, may also be considered exempt.

2.3 Other exemptions

Loose wood packing materials such as sawdust and shavings, and raw wood cut into thin¹ pieces such as wood used for the manufacture of fruit boxes, may also be considered exempt where the importing NPPO has determined that such products are not an important pathway for the introduction and spread of quarantine pests.

The NPPO of an importing contracting party can exempt any other contracting party (or exporter) from requirements for non-manufactured wood packing material where the pest risk is demonstrated to be adequately managed by existing or proposed procedures. The NPPOs of the importing and exporting countries should confirm these arrangements bilaterally.

3. NPPO responsibilities

3.1 Setting requirements

Non-manufactured wood packing, including wood packing that is comprised partially of manufactured wood, imported with any cargo may be subject to phytosanitary regulations or procedures. Requirements may range from simple visual inspection to treatment and certification arrangements.

¹ For Customs purposes, thin wood is considered to be 6mm or less. [cite reference?]

The process for establishing of import requirements for wood packing may be slightly different from that used for commodities moving as consignments. The normal process of undertaking risk analysis to determine if measures are necessary and the strength of such measures is frequently not possible for wood packing material because the actual origin of the material may not be known. For this reason, it is desirable to regulate wood packing broadly by requiring treatment or processing which eliminates all pests that might be present in raw wood – termed here universal measures. An NPPO may require phytosanitary certificates for wood packing. However, recognising the operational difficulties associated with the issuance of phytosanitary certificates for wood packing, NPPOs of importing countries are encouraged to accept alternative methods for verifying compliance. In some cases, where the source of packing material is known, the pest list of the exporting country may be used as the basis for PRA and allow for the development of specific treatments or system approaches.

3.2 Undertaking compliance checks on treatments applied prior to export

The NPPO has responsibility for ensuring that internal systems for exports meet the requirements set out in section 4 of this standard or those confirmed with the NPPOs of affected contracting parties. This includes monitoring certification systems for verification of compliance with requirements and establishing inspection procedures.

3.3 Transit arrangements

Where consignments are imported by one or more other countries, the NPPOs of the transit countries should be consulted by the NPPO of the importing contracting party and agreement reached over the requirements to met in respect of consignments in transit.

3.4 Application of measures on arrival

The development and application of import requirements is based on pests that may be associated with the raw wood. However, it should be recognized that wood packing treated or processed to be free of these pests may nonetheless become subsequently infested or contaminated and, as with manufactured wood products or any other article, require emergency actions based on the pests found. Therefore, requirements should always provide at minimum for the possibility to inspect according to established procedures and take emergency action as necessary.

3.5 Information requirements

The NPPO of the importing country may require certain information for risk analysis and the development, implementation or review of specific import requirements. This may include:

- details regarding the source of raw material. (In most cases, information regarding the origin will not be known.)
- procedure for the control of identity of the product
- identified target pests to be removed or killed
- demonstrated efficacy of the treatment method or measure
- mechanism to verify the phytosanitary status of the product
- parties responsible for inspection, control, verification and certification
- mechanism and frequency of audit.

4.0 Universal measures

Where information regarding origin is not known, universal measures should be applied. Universal measures involve treatment, processing, or a combination of these which permanently change the character of the wood and which removes or kills pests and should be accepted by all NPPOs as adequate basis for authorizing the entry of non-manufactured wood packing without further requirements except where secondary infestation has occurred, or is considered likely to have occurred, as determined based on inspection. Kiln drying and chemical pressure impregnation are such Universal measures.

4.1 Kiln drying (KD)

The non-manufactured wood packing material should be dried by heating in a closed chamber in accordance with a specific time-temperature schedule which achieves a minimum wood core temperature of [56°C] for at least [30 minutes] and a moisture content [below 20 percent] as expressed as a percentage of dry matter.

Kiln dried wood packing should display the marking shown in Appendix I or alternatively may be accompanied by a phytosanitary certificate attesting to the treatment. NPPOs are responsible for ensuring the credibility of systems producing KD material. The certification of KD status may be based on other than a phytosanitary certificate where other forms of certification have been agreed on a bilateral basis.

4.2 Chemical pressure impregnation (CPI)

Non-manufactured wood packing material that has been pressure treated (impregnated) with an approved chemical preservative in accordance with an officially recognized technical specification display the marking shown in Appendix I or alternatively may be accompanied by a phytosanitary certificate attesting to the treatment. NPPOs are responsible for ensuring the credibility of systems producing KD material.

Verification of CPI should be based on impregnation of the wood by a specific colour stain or CPI wood packing should display the marking shown in Appendix I. Alternatively, CPI wood packing may be accompanied by phytosanitary certificate attesting to the treatment. NPPOs are responsible for ensuring the credibility of systems producing CPI treated material. The certification of CPI treated status may be based on other than phytosanitary certification where other forms of certification have been agreed on a bilateral basis.

5. Other approved measures

In cases where universal measures cannot be applied or verified by an exporting contracting party, the NPPO of the importing contracting party should require at minimum that non-manufactured wood packing is comprised of bark-free wood and free of signs of live pests. On arrival, it may be subject to inspection, and treatment or disposal, if appropriate, by the NPPO of the importing contracting party. It should be recognised that dunnage is likely to comprise such wood packing.

In addition, where the efficacy of a treatment cannot be verified for a particular quarantine pest, an importing NPPO may require wood packing to be bark free as a minimum

requirement prior to treatment.

5.1 Fumigation with methyl bromide

Fumigation with methyl bromide may be effective as a treatment for certain pests depending on the pests of concern and the rate used (see Appendix II for commonly prescribed rates and applications). NPPOs should recognize that methyl bromide treatment does not change the character of the wood. Fumigation treatments have no residual effect and therefore do not prevent re-infestation or secondary infestation. Given there is a likelihood of re-infestation or secondary infestation, NPPOs of importing contracting parties may consider setting a time limit for the period between fumigation and shipment and may consider other safeguards to ensure the phytosanitary status of the wood packing.

NPPOs are encouraged to use this treatment as an emergency action rather than a routine measure.

Wood packing treated by fumigation should be accompanied by a phytosanitary certificate attesting to the treatment. The certification of fumigation treatment may be based on other than a phytosanitary certificate where other forms of certification have been agreed on a bilateral basis.

5.2 Pest management systems

Pest management systems which result in the non-manufactured wood packing being free from quarantine pests may be accepted by the national plant protection organization of the importing country. An acceptable pest management system would be a systems approach to risk management which involve the application of pest mitigation procedures at specific controllable points in the production of wood packing. Such systems should be demonstrated to substantiate the key components noted in section 3.4.

6. Non-compliance

Any wood packing may be subject to inspection by the NPPO of the importing contracting party. Where requirements have not been met, or wood packing is found to be infested or contaminated with quarantine pests, the wood packing may be subject to treatment, if available, where it is considered that, as a result of the treatment, the requirements are fulfilled. Where a treatment is not available, the wood packing should be disposed of or refused entry. Where significant non-compliance occurs or in an emergency situation, exporting parties should be notified (see ISPM No. 12: *Guidelines on notification of non-compliance*).

6.1 Signs of live pests

Phytosanitary actions should not be taken without sufficient technical justification. On wood packing to which a universal measure has been applied, action should not be taken on signs of pests or presence of bark alone. Action can be taken based on sign of live pests (e.g. insect holes) or bark in raw wood if quarantine pests have been found to be associated with such signs at the time of inspection, or on previous inspection(s) of equivalent consignments. Treatment should not be applied if an active quarantine pest has not been found to be

associated with the signs at any time in equivalent consignments. In the case of consignments of a new commodity or consignments from a new source, it may be practical to take emergency action based on the signs of live pests or bark without detection of the pest.

6.2 Disposal

Disposal of wood packing is a risk management option that can be used on arrival where treatment options are not available to the NPPO of the importing country. The following methods are recommended for the destruction of non-manufactured wood packing which does not comply with this standard or which requires emergency action:

Incineration – Complete burning.

Landfill - Deep burial, minimum 2 metres (6.5 feet) in depth, in landfill sites approved by the NPPO and according to approved procedures. (NB. not suitable for termites)

Processing – Chipped and processed in a commercial chipper and processed in a manner approved by the NPPO of the importing country for the elimination of pests of concern (e.g. manufacture of oriented strand board).

Other methods – procedures endorsed by the NPPO as effective for the pests of concern.

The non-compliant wood packing should be appropriately safeguarded prior to treatment or disposal to prevent escape of any pest between the time of the detection of the non-compliance and the time of treatment or disposal.

Appendix 1 - Symbols or marking for KD

Appendix 2 – [Symbols or marking for CPI?]

Appendix 3 - Fumigation schedules

Appendix 4 - References on treatments?

Recommendations to the ICPM for associated standards (in order of priority)

1. Treatment efficacy:
 - how to assess
 - research requirements
 - alternatives (in the context of equivalence)
2. Systems approaches (already in the standard-setting work programme)
3. Pathway analysis (epidemiology of pest movement)
4. Other wood products (logs, lumber, etc.)
5. Other packing material (straw, hulls and chaff, litter, etc)

Terms of Reference for the Ad hoc Treatment Review Committee

The NAPPO Forestry Panel undertakes, with the cooperation of the IPPC Secretariat, interested members of the Expert Working Group on Wood Packaging, and other experts, to:

1. Identify relevant efficacy data and consult with relevant experts on wood packing treatments, in particular:
 - 56/30 KD
 - CPI
 - MeBr fumigation
2. Evaluate the information obtained with a view to finalizing relevant portions of the draft standard on wood packing.
3. Prepare draft summary recommendations on wood packing treatments and supporting data. Note non-phytosanitary issues that may impact usability or acceptance of treatments (e.g. health or environmental concerns). Submit draft summary recommendations for review by an ad hoc meeting of the Expert Working Group at the time of the NAPPO Annual Meeting, (October 16, 2000).
4. Consult international experts regarding data requirements to prove the efficacy and acceptability of treatments in general and wood packing treatments in particular.
5. Prepare draft guidelines for the systematic evaluation of other treatments in the wood packing and other standards.

Research needs

1. Identification of immature forms of organisms
2. Efficacy data for more pests, and more treatment options:
 - Glue line treatments
 - MeBr Fumigation
 - Phostoxin
 - Sulphuryl fluoride
 - Heat
 - “drowning” – sea water
 - preservative
 - boron
 - certification
 - inspection
3. If data supporting the adoption of Universal measures is inadequate, conduct appropriate research to the gaps.
4. Resistance of pests to treatments.
5. Pathway analysis and pest distribution information.